

CLARK HILL, PLLC  
JEREMY THOMPSON, ESQ.  
Nevada Bar No. 12503  
E-mail: jthompson@clarkhill.com  
3800 Howard Hughes Parkway, Suite 500  
Las Vegas, Nevada 89169  
Tel: (702) 697-7527  
Fax: (702) 862-8400  
*Attorneys for Defendant EQUIFAX  
INFORMATION SERVICES LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARK A. SMITHERMAN

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC., EQUIFAX INFORMATION SERVICES,  
LLC, TRANS UNION, LLC, AND PLUSFOUR,  
INC.

Defendants.

Case No. 2:20-cv-00579-JCM-DJA

**STIPULATION AND ORDER TO EXTEND  
TIME FOR DEFENDANT EQUIFAX  
INFORMATION SERVICES LLC TO  
RESPOND TO PLAINTIFF'S COMPLAINT  
(FIRST REQUEST)**

Pursuant to LR IA 6.1, Plaintiff MARK A. SMITHERMAN and Defendant EQUIFAX INFORMATION SERVICES LLC, ("Equifax") by and through their respective counsel hereby stipulate as follows:

1. On March 24, 2020, Plaintiff filed a Complaint against Defendant, Equifax, in the United States District Court, District of Nevada, titled *Mark A. Smitherman v Experian Information Solutions, Inc., Equifax Information Services, LLC, Trans Union, LLC, and PlusFour, Inc.*; Case No. 2:20-cv-579.

2. Equifax was served via process server on its registered agent, CSC, on March 30, 2020. Defendant, Equifax, acknowledged receipt of service.

3. Defendant Equifax's deadline to answer is April 20, 2020.

4. The World Health Organization recently designated the COVID-19 virus as a global pandemic; multiple federal courts have canceled trials and hearings; and state and local governments are taking precautionary measures to prevent the spread of the virus. Although the situation is still developing,

all parties have already been affected by this crisis. For example, in Georgia - where Equifax is based and where lead counsel for Equifax live and work - the governor has declared the first-ever public health state of emergency in the state. As a result, both Equifax and its law firm, Seyfarth Shaw LLP, have implemented remote work policies to combat the spread of this novel virus.

5. In light of the COVID-19 pandemic and office closings, Equifax and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff. Accordingly, Equifax respectfully requests an initial extension of the deadline to respond to Plaintiff's Complaint, up to and including, May 11, 2020.

6. This motion is made in good faith, not for the purposes of delay, and granting it will not prejudice any party. This extension of time will allow Equifax sufficient time to fully investigate the allegations and claims raised by Plaintiff's Complaint, confer with counsel, and prepare its response. This is Defendant Equifax's first request for an extension of time.

7. On April 9, 2020, Equifax's counsel conferred with Plaintiff's counsel regarding the basis for this request and its need for an extension. Plaintiff's counsel had no objection and provided his assent to the requested extension.

NOW THEREFORE, the Parties hereby stipulate and agree to a sixty-day extension of time for Defendant to answer or otherwise respond to Plaintiff's Complaint through and including May 11, 2020.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

**No Opposition**

DATED: April 20, 2020

PRICE LAW GROUP

By: //s// Steven A. Alpert

Steven A. Alpert, Esq.  
Nevada Bar No.: 8353  
5940 S. Rainbow Blvd., Ste. 3014  
Las Vegas, NV 89118  
Tel: (702) 794-2008  
E-Mail: alpert@pricelawgroup.com  
*Attorney for Plaintiff*  
MARK A. SMITHERMAN

1 DATED: April 20, 2020

CLARK HILL, PLLC

3 By: //s// Jeremy J. Thompson  
4 JEREMY J. THOMPSON, Esq.  
5 Nevada Bar No.: 12503  
6 3800 Howard Hughes Parkway, Suite 500  
7 Las Vegas, Nevada 89169  
8 Tel: (702) 697-7527  
9 E-mail: jthompson@clarkhill.com  
10 Attorneys for Defendant EQUIFAX  
11 INFORMATION SERVICES LLC

12 **ORDER**

13 IT IS SO ORDERED:

14 

15 Daniel J. Albregts  
16 United States Magistrate Judge

17 Dated: April 24, 2020